

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JONATHAN DAVILA,
GEORGE PUGACHEV and
DAMIEN DELEON

Plaintiffs,

-against-

THE CITY OF NEW YORK,
P.O. MICHAEL GIALLANZA,
P.O. "JANE DOE" and
P.O. "JOHN DOE" 1-10.

1 'through' 10 inclusive,
the names of the last Defendants
being fictitious, the true names
of the Defendants being unknown
to the Plaintiffs(s).

Defendants.
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Case: 19-cv-7109

COMPLAINT

PLAINTIFF'S DEMAND
TRIAL BY JURY

Plaintiffs JONATHAN DAVILA, GEORGE PUGACHEV and DAMIEN DELEON, by and through their attorney, Paul Hale, Esq. 26 Court St. Ste. 913 Brooklyn, NY 11242, complaining of the Defendants, The City of New York, P.O. MICHAEL GIALLANZA, Police Officers "John" and "Jane" Doe, collectively referred to as the Defendants, upon information and belief allege as follows:

JURISDICTION AND VENUE

1. Jurisdiction over these claims is conferred upon this Court pursuant to 28 U.S.C. § 1331 and § 1343(a)(3), this being an action authorized by law to redress the deprivation of rights secured under color of state and city law, statute, ordinance, regulation, custom and usage of a right, privilege and immunity secured to the Plaintiffs by the First, Fourth, Eighth and